IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

PETER P. STRZOK,)))	
Plaintiff, v.)) Civil Action No. 1	l:19-cv-2367
ATTORNEY GENERAL WILLIAM F. BARR, et al.,)	
Defendants.)))	

PLAINTIFF'S MOTION TO DEVIATE FROM LOCAL CIVIL RULE 5.1(c)

Local Civil Rule 5.1(c)(1) requires that the "first filing by or on behalf of a party shall have in the caption the name and full address of the party." Plaintiff hereby seeks leave to omit his home address from the caption of the first filing—his Complaint filed earlier today—and deviate from this requirement.

As detailed in the Complaint, plaintiff has been the subject of intense media interest for approximately two years; this is in part because the President of the United States has engaged in ongoing, vitriolic commentary about plaintiff, primarily via Twitter. Since mid-2017, plaintiff and his family have and continue to receive death threats and other threats against their safety. Finally, one of the harms for which Mr. Strzok seeks redress is the government's unauthorized release of information about him to the media. Including his home address in publicly available court papers would serve only to exacerbate the harm and danger that Mr. Strzok and his family have already endured. Defendants possess his home address, and no prejudice will result from

omitting this information from the Complaint. Plaintiff therefore respectfully requests that this Court grant leave to omit his home address from his first filing.

Date: August 6, 2019 Respectfully submitted,

/s/ Aitan D. Goelman

Aitan D. Goelman (DC Bar 446636) ZUCKERMAN SPAEDER LLP 1800 M Street, NW, Suite 1000 Washington, DC 20036

Tel: (202) 778-1800

AGoelman@zuckerman.com

/s/ Richard A. Salzman

Richard A. Salzman (DC Bar 422497) Julia T. Quinn (DC Bar 1031695) HELLER, HURON, CHERTKOF & SALZMAN PLLC 1730 M Street, NW, Suite 412

Washington, DC 20036 Tel: (202) 293-8090 salzman@hellerhuron.com quinn@hellerhuron.com

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of August, 2019, a copy of the foregoing was served by first class mail upon the defendants at 950 Pennsylvania Avenue NW, Washington, DC 20530, and upon the Office of the United States Attorney for the District of Columbia, 555 4th Street, NW, 5th Floor, Washington, DC 20530.

/s/ Aitan D. Goelman

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

	
PETER P. STRZOK,))
Plaintiff, v.)) Civil Action No. 1:19-cv-2367
ATTORNEY GENERAL WILLIAM F. BARR, et al.,)))
Defendants.)))
PROPOSED ORDER G	GRANTING MOTION TO DEVIATE
For the reasons set forth in Plainti	ff's Motion to Deviate from Local Civil Rule 5.1(c), it
is hereby	
ORDERED that the Motion is G l	RANTED; and it is further
ORDERED that the Plaintiff may	proceed in this matter without including his full
address in the caption of his first filing; a	nd it is further
ORDERED that the Clerk shall a	ccept for filing and docket Plaintiff's Complaint.
This Order is effective nunc pro to	unc to the date of said filing.
Date:	U.S. District Court Judge
	- · · · · · · · · · · · · · · · · · · ·